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POWER BUSINESS TECHNOLOGY, LLC

7 **BOUTIN JONES INC.**

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12 Attorneys for Defendants

WiZiX Technology Group, Inc., Gary Johnson,

13 Tyler Johnson, Brad Farnum, and Joseph Power

14 **UNITED STATES DISTRICT COURT**

15 **EASTERN DISTRICT OF CALIFORNIA**

17 POWER BUSINESS TECHNOLOGY, LLC,

18 Plaintiff,

19 vs.

20 WiZiX TECHNOLOGY GROUP, INC.;
21 GARY JOHNSON; TYLER JOHNSON;
22 BRAD FARNUM; JOSEPH POWER; and
23 DOE Defendants 1 through 20, inclusive,

24 Defendants.

Case No. 2:23-CV-00518-DAD-AC

STIPULATION AND [PROPOSED]
ORDER MODIFYING SCHEDULING
ORDER [ECF NO. 45]

Complaint filed: March 17, 2023

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1 Plaintiff, Power Business Technology, Inc. (“Plaintiff”) and Defendants, WiZiX Technology
 2 Group, Inc. (“Wizix”), Gary Johnson, Tyler Johnson, Brad Farnum, and Joe Power (collectively
 3 “Defendants”), by and through their counsel of record, met and conferred on the existing scheduling
 4 order, issued on September 18, 2024. (ECF No. 45.)

5 The Parties agree that, despite diligent efforts to advance the case, good cause exists to modify
 6 the scheduling order. FRCP Rule 16(b). Additional time is necessary to complete discovery and
 7 prepare for trial. Specifically, the parties anticipate that discovery will require the review and
 8 production of a significant amount of electronically stored information (“ESI”), and will include the
 9 exchange of highly sensitive information that will necessitate a protective order. To that end, the
 10 parties are working on an ESI protocol, appropriate search terms, and stipulated protective order, in
 11 addition to meeting and conferring on other discovery-related issues. The current fact discovery
 12 deadline of July 7, 2025 creates an unnecessary burden on all parties, especially since trial is not set
 13 to begin until April of 2026. The Parties believe the scheduling order can be modified without
 14 changing the trial date.

15 Accordingly, the Parties hereby stipulate and submit the following proposed changes to
 16 certain deadlines in the September 18, 2024 scheduling order:

Deadline	Current Deadline	Proposed Deadline
Fact Discovery Shall Be Completed	July 7, 2025	December 1, 2025
Disclosure of Initial Experts and Production of Reports	July 18, 2025	December 15, 2025
Disclosure of Rebuttal Experts and Production of Reports	August 19, 2025	January 5, 2025
Expert Discovery Shall be Completed	September 16, 2025	January 16, 2026
Deadline to file all motions, except motions for continuances, temporary	October 31, 2025	January 23, 2026

1 restraining orders, or other emergency applications		
3 Final Pretrial Conference	February 25, 2026 at 10:00 a.m.	No change.
5 Jury Trial	April 27, 2026 at 9:00 a.m.	No change.

8 DATED: April 18, 2025

STOEL RIVES LLP

10 By: s/ Corey M. Day
11 THOMAS A. WOODS
12 COREY M. DAY
13 Attorneys for Plaintiff POWER
14 BUSINESS TECHNOLOGY, LLC

14 DATED: April 18, 2025

BOUTIN JONES INC.

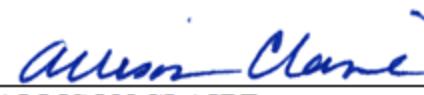
16 BY: s/ Ian K. McGlone

17 Daniel S. Stouder
18 Ian K. McGlone

19 Attorneys for Defendants
20 WiZiX Technology Group, Inc., Gary Johnson,
21 Tyler Johnson, Brad Farnum, and Joseph Power

1 [PROPOSED] ORDER
23 Before the Court is the Parties' stipulation regarding proposed changes to the September
4 18, 2024 scheduling order. (ECF No. 45.) After reviewing the stipulation, the Court finds that
good cause exists to revise the scheduling order and revises it as follows:
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6 Deadline	7 Current Deadline	8 New Deadline
9 Fact Discovery Shall Be Completed	10 July 7, 2025	11 December 1, 2025
12 Disclosure of Initial Experts and 13 Production of Reports	14 July 18, 2025	15 December 15, 2025
16 Disclosure of Rebuttal Experts and 17 Production of Reports	18 August 19, 2025	19 January 5, 2025
20 Expert Discovery Shall be Completed	21 September 16, 2025	22 January 16, 2026
23 Deadline to file all motions, except 24 motions for continuances, temporary 25 restraining orders, or other emergency 26 applications	27 October 31, 2025	28 January 23, 2026
29 Final Pretrial Conference	30 February 25, 2026 31 at 10:00 a.m.	32 No change.
33 Jury Trial	34 April 27, 2026 35 at 9:00 a.m.	36 No change.

37 IT IS SO ORDERED.
3839 DATED: May 21, 2025
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42 ALLISON CLAIRE
43 UNITED STATES MAGISTRATE JUDGE
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